

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	:
Joseph Zwicharowski	:	Chapter 13
	:	Case No. 17-11811-MDC
Debtor(s)	:	

RESPONSE TO THE MOTION FOR RELIEF OF AUTOMATIC STAY
FILED BY NATIONSTAR MORTGAGE LLC

Debtor, Joseph Zwicharowski, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by Nationstar Mortgage LLC, hereby submits the following:

1. Admitted
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Denied.
8. Denied.
9. Denied. Debtor avers all payments to date.
10. Admitted.
11. Denied.
 - a. Denied.
 - b. Denied.
 - c. Denied.
12. Denied.
13. No response required.

WHEREFORE, based on the aforementioned, Debtor respectfully requests that Movant shall be denied an Order granting relief of the Automatic Stay pursuant to 11 U.S.C. § 362.

Dated: June 16, 2022

/s/ Brad J. Sadek, Esq.

Brad J. Sadek, Esq.
Attorney for the Debtor
Sadek & Cooper
1315 Walnut Street, #502
Philadelphia, PA 19107
(215) 545-0008

CERTIFICATE OF SERVICE

I, Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

Kenneth E. West, Esq.
Standing Chapter 13 Trustee
Electronic Notice

Lily C. Calkins, Esq.
Attorney for Movant *Nationstar Mortgage LLC*
Electronic Notice to *logsecf@logs*

Dated: June 16, 2022

/s/Brad J. Sadek, Esq.
Brad J. Sadek, Esq.
Attorney for Debtor
1315 Walnut Street
Suite #502
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